

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ASSOCIATED RECOVERY, LLC,

Plaintiff,

v.

JOHN DOES 1-44,

Defendants *in rem*.

No. 3:16-CV-1025-L

In re:

744.COM	KXW.COM	UHW.COM	YJX.COM
028.COM	LNМ.COM	VCZ.COM	YLZ.COM
3DCAMERA.COM	LUOHE.COM	VGJ.COM	YQP.COM
FNY.COM	MEQ.COM	WYD.COM	YQT.COM
FX2.COM	OCU.COM	XAQ.COM	YRN.COM
FXF.COM	PIXIE.COM	XFF.COM	YTE.COM
JTZ.COM	QMH.COM	XSG.COM	YYG.COM
KGJ.COM	RUTEN.COM	YCX.COM	ZDP.COM
KMQ.COM	SDU.COM	YEY.COM	ZHD.COM
KOU.COM	SQG.COM	YGX.COM	ZULIN.COM
KXQ.COM	TAOLV.COM	YJR.COM	ZZM.COM

**REPLY IN SUPPORT OF JTZ.COM, OCU.COM, YTE.COM'S MOTION TO JOIN
DEFENDANTS' RENEWED RULE 12(b) MOTION TO DISMISS**

As anticipated in Movant's Motion (Dkt. 74 at 2-3), Movants JTZ.com, OCU.com, YTE.com joined in the August 22, 2016 Defendants' Rule 12(b) Motion to Dismiss Amended Complaint (Dkt. 80). The August 22nd motion seeks to dismiss Plaintiff's Amended Complaint (Dkt. 76), which superseded Plaintiff's original Complaint (Dkt. 1). Accordingly, Movants no longer need to join in the earlier Motion to Dismiss (Dkt. 47). Plaintiff argues the same in its Opposition. Dkt. 78 at 2. Thus, the parties agree that **this Motion is now moot.**

Plaintiff's Opposition (Dkt. 78) raises the tangential issue of whether this case is *in rem* or *in personam*. That issue is fully addressed in Defendants' operative Motion to Dismiss (Dkt. 80) but is irrelevant to the issue at bar, particularly given that the instant Motion is moot.

Dated: August 25, 2016

Respectfully submitted

By: /s/ Steven M. Geiszler

Of Counsel:

Lora A. Brzezynski
Claire M. Maddox
Eric Y. Wu
DENTONS US LLP
1900 K Street, NW
Washington, DC 20006
202-496-7500 (phone)
202-496-7756 (fax)
lora.brzezynski@dentons.com
claire.maddox@dentons.com
eric.wu@dentons.com

Steven M. Geiszler
Texas Bar No. 24032227
Zunxuan D. Chen
Texas Bar No. 24059564
Juanita DeLoach
Texas Bar No. 24064218
DENTONS US LLP
2000 McKinney Avenue, Suite 1900
Dallas, Texas 75201-1858
T: (214) 259-0900
F: (214) 259-0910
steven.geiszler@dentons.com
digger.chen@dentons.com
juanita.deloch@dentons.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 25, 2016 I caused the foregoing document to be served on counsel of record via the Court's CM/ECF system.

/s/ Steven M. Geiszler

Steven M. Geiszler